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NAS FORT WORTH
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LETTER REGARDING REGULATORY REVIEW AND APPROVAL OF OFFSITE WEAPONS
STORAGE AREA NAS FORT WORTH TX
3/23/2000
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 516

MAR 28 REC'D

516

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 23, 2000

Mr. Rafael E. Vazquez
Regional BRAC Environmental Coordinator
AFBCA/ROL Bergstrom AFB
3711 Fighter Drive
Austin, TX. 78719-2557

Re: Carswell Air Force Base
TNRCC Solid Waste Registration No. 65004
Hazardous Waste Permit No. HW-50289
Review of RCRA Facility Investigation of the Offsite Weapons Storage Area
Request for Revisions

Dear Mr. Vazquez:

The Texas Natural Resource Conservation Commission (TNRCC) has completed the review of the *RCRA Facility Investigation of the Offsite Weapons Storage Area* (RFI report) dated July 1999 and received by the TNRCC on July 26, 1999. The TNRCC also reviewed comments received from EPA Region 6 dated August 23, 1999. The Building 8503 Weapons Storage Area Waste Accumulation Area was identified in the TNRCC's March 2, 1995 letter as solid waste management unit (SWMU) No. 59 and required an RFI. In addition to SWMU No. 59, the RFI report also incorporated the investigation of the following associated sites:

- Outdoor material storage and maintenance area;
- Unpaved perimeter of SWMU No. 59;
- Disturbed surface area southwest of control fence;
- Explosive Ordinance Disposal (EOD) Range;
- Bunker floor drain outlets;
- Removed underground storage tank (UST) locations;
- Vehicle fueling area;
- Areas beneath transformers; and
- Leach field

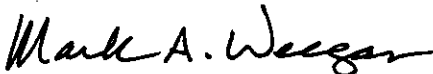
Based upon our review of the RFI report, the TNRCC has no additional comments beyond those already provided to the Air Force Base Conversion Agency (AFBCA) by EPA Region 6 and dated August 23, 1999, a copy of which is included as an enclosure. It is the TNRCC's understanding that

Mr. Rafael E. Vazquez
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a revised RFI report/closure report for the Offsite Weapons Storage Area will be submitted to the TNRCC and EPA for review and approval in the July 2000 time-frame. AFBCA should ensure that this final investigation/closure report adequately characterizes the nature and extent of any releases of solid waste to background levels for inorganics and to the practical quantitation limit (PQL) for organics.

Questions concerning this letter should be directed to me at (512) 239-2360 or via e-mail: mweegar@tnrcc.state.tx.us. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TNRCC Region 4 Office in Arlington. The TNRCC Solid Waste Registration Number and Unit Name should be referenced in all submittals.

Sincerely,



Mark A. Weegar, Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission

MW:mw

Enclosure

cc: Mr. Gary Miller, U.S. EPA Region VI, Dallas, TX.(6PD-NB)
Mr. Tim Sewell, TNRCC Region 4 - Austin (MC-R4)



UNITED STATES ENVIRONMENTAL PROTECTION
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

516 3
SWR # 85004
CAS # 5552
PROJ. MGR MW.

August 23, 1999

RECEIVED

AUG 31 1999

REMEDIATION DIVISION
Corrective Action Section

Mr. Mark A. Weegar
Corrective Action Section
Remediation Division, MC-127
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Weegar:

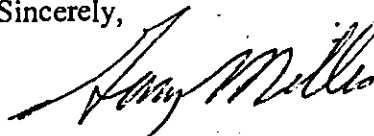
The Environmental Protection Agency (EPA) has reviewed the document, "Final RCRA Facility Investigation of the Offsite Weapons Storage Area at NAS Fort Worth Joint Reserve Base Carswell Field, Texas." This report was received by EPA on July 26, 1999. Based on this review, EPA provides the following comments:

1. **Page 1-19, 1.3.2.7 Background Study.** Two monitoring wells were installed as part of this study, one of these is offsite. These wells should be properly closed by the Air Force prior to transfer of the property.
2. **Page 1-20, 1.4.3 Clearance of the EOD Range.** The comment at the end of this paragraph, concerning future use of this area indicates that some type of deed restriction may be needed to restrict future land uses. During a recent site visit various small arms and metallic items were observed. It appears these items are coming to the surface from erosion of the surface soils. Since the last sentence indicates "EOD personnel should be contacted if the land is to be used for a purpose other than livestock grazing or for other activities which would result in disturbing the ground below a depth of 1 foot", additional clearance of this site appears warranted.
3. **General Comment.** The ecological risk assessment should include the exposure or diet information for all the receptors. This is not included in the body of the report, nor in Appendices R and S.
4. **Page 2-34, 2.4.3 Methodology for Risk Evaluation.** A 1% frequency of detection is stated as being the determination of carrying forward a chemical through the risk-based screening process. Where did the 1% come from? EPA generally uses less than 5% detected in at least 20 samples.
5. **Page 4-10, 4.3.1 Potential Human Receptors.** Fish consumption is stated as being a plausible exposure route, yet the risk assessment does not address this pathway.

6. **Page 5-6, 5.1.3 Cleanup Levels Development and Screening.** The document relies upon the Texas MSCs as providing clean-up levels for all exposure pathways. The Texas numbers do not address exposure during showering and do not address fish consumption. These pathways are identified by Carswell as valid pathways. The risk assessment, therefore, needs to develop risk-based numbers for these pathways and compare site contamination. The risk assessment is focused upon meeting RRSN1 or RRSN2 values. The base must meet both EPA and TNRCC requirements.
7. **Table 5-3, Applicable RRSN2 MSCs and Promulgated Standards for the COPCs.** The column labeled, "Texas Surface Water Quality Standards" should have more values listed. Table 3 of the Texas Surface Water Standards (WQS) has standards for several of the chemicals that are left blank on the Carswell table. TNRCC also has standards for the protection of aquatic life found in the WQS in Table 1. Since these values are ARARs, the risk assessment must compare these values to the data developed by Carswell for the appropriate exposure pathway.
8. **Table 5-17, Ratio of Site Land Areas to Animal Home Ranges.** This table depicts the ratio of the individual land area of the specific site with the home range of the receptor. This is probably inappropriate as it assumes that the small areas are independent of the others. In other words, it assumes a small area of contamination with pristine conditions surrounding it and that the home range of the receptor only comes into contact with contamination at the particular listed area. Several of these small areas are next to other contaminated areas.
9. **Table 5-18, Level C Screening Assessment of Wildlife.** Because of the above defined flaw, the column labeled, "HQ adjusted for home range" is not useful in assessing ecological risks.
10. **Page 6-15, 6.1.3 Ecological Evaluation Conclusions.** The summary justifies that no action is required because of the small acreage affected and the lack of ecologically critical species. These two justifications are flawed. In other comments, the way home range was compared, is not useable and the term "ecologically critical" is neither defined nor recognized by EPA as valid.

Please contact me at (214)665-8306 should you wish to discuss this further.

Sincerely,



Gary W. Miller
Senior Project Manager
Base Closure Team

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ADMINISTRATIVE RECORD

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